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7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
9 **SAN JOSE DIVISION**

10 IN RE: HIGH-TECH EMPLOYEE
11 ANTITRUST LITIGATION

Master Docket No. 11-CV-2509-LHK

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13 THIS DOCUMENT RELATES TO:
14 ALL ACTIONS.

**DECLARATION OF KENNETH JUE, ON
BEHALF OF SETTLEMENT
ADMINISTRATOR, REGARDING
COMPLIANCE WITH NOTICE
REQUIREMENTS**

15 I, KENNETH JUE, declare:

16 1. I am employed as a project manager by Gilardi & Co. LLC ("Gilardi"), located at 3301
17 Kerner Blvd., San Rafael, California. Gilardi serves as the Court-appointed Settlement Administrator
18 regarding the settlement with Defendants Adobe Systems Incorporated, Apple Inc., Google Inc., and Intel
19 Corporation (collectively, the "Settling Defendants"), as set forth in the Settlement Agreement. As the
20 case manager at Gilardi, I oversaw the administrative services provided. I have personal knowledge of the
21 facts set forth herein and, if called as a witness, could and would testify competently thereto.

22 2. On March 23, 2015, Gilardi received class member data from Heffler Claims Group, the
23 Court-appointed Settlement Administrator regarding the previous settlements with Intuit Inc., Lucasfilm
24 Ltd., and Pixar. The records contained Class Member names, last known addresses, compensation data,
25 and dates of employment, which Gilardi used to construct a mail table.

26 3. On March 11, 2015, Heffler transferred the settlement website domain,
27 www.HighTechEmployeeLawsuit.com, to Gilardi. On the settlement website, Class Members can view
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1 and print copies of the Long-Form Notice ("Notice"), Settlement Agreement, Complaint, Motions for
2 Attorneys' Fees, Reimbursement of Expenses, and Service Awards, and related documents, and consult
3 Frequently Asked Questions. Class Members are able to view their job positions by logging in with an ID
4 and access code located on their mailed Notice, plus the last four digits of their SSN. The toll-free
5 telephone number, email address, and mailing address for administration of this case are posted on the
6 Settlement Website through a "Contact Us" link. To date, there have been a total of 1,761 web visitors to
7 the settlement website.

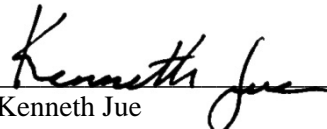
8 4. On April 6, 2015, Gilardi caused the Notice to be mailed to all Class Member mailing
9 addresses. A true and correct copy of the Notice is attached hereto as Exhibit A. Prior to mailing the
10 Notice, Gilardi updated the mailing addresses on the class list through the National Change of Address
11 database.

12 5. Since mailing the Notice 2,939 Notices were returned as undeliverable. These Class
13 Members' name and address were run through a skip-trace search, and to date, Gilardi has updated and
14 remailed 2,339 Notices for these Class Members. Of those 2,339 remailed Notices, 139 were again
15 returned as undeliverable. Therefore, to date, approximately 99% of the class appears to have successfully
16 received notice.

17 6. On or before March 24, 2015, Gilardi established a toll free telephone number, 888-285-
18 0335, that Class Members could call and listen to Frequently Asked Questions and request a Notice to be
19 mailed to them. To date, Gilardi has received 780 calls to the toll free telephone number.

20 7. To date, Gilardi has received 56 requests for a mailed copy of the Notice over the phone,
21 by email, and by mail. Gilardi sent a copy of the Notice whenever one was requested.
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24 I declare under penalty of perjury under the laws of the State of California that the foregoing is
25 true and correct and that this declaration was executed this 5th day of June, 2015, at San Rafael,
26 California.

27 
28 Kenneth Jue